

Appendix B – Disputed Definition and RFPs

RFP No. / Definition	Original Request	Operative Request as Proposed by Defendants
“Online Media & Communications Services”	“Online Media & Communications Services” refers to websites and applications that enable users to create and share content, participate in social networking or send and receive private messages in any form (e.g., text, images, audio, videos, etc.). These include but are not limited to Facebook, Instagram, Snapchat, TikTok, YouTube, Discord, Facebook Messenger, Facetime, Google Chat, GroupMe, iMessage, Kik, LINE, Google Messages (i.e., Android SMS, MMS, RCS, etc.), Messenger Kids, Microsoft Teams, Oovoo, Pinterest, Reddit, Signal, Slack, Telegram, Threads, Tumblr, Viber, WhatsApp, X (formerly known as Twitter), Yik Yak, and Zoom.	“Online Media & Communications Services” refers to websites or applications designed for social networking where users create online communities to share information and does not include email or passive websites where school-related information is merely posted for students and their parents to view. These include but are not limited to Facebook, Instagram, Snapchat, TikTok, YouTube, BeReal, Discord, GroupMe, iMessage, Kik, Omegle, Pinterest, Reddit, Slack, Telegram, Twitch, Tumblr, WhatsApp, X (formerly known as Twitter), and YikYak.
27	All Documents relating to any criminal or disciplinary action or investigation of any employee of the School District for any (i) charged felony, (ii) charged misdemeanor, or (iii) allegations of misconduct involving interactions with any minor during the Relevant Time Period	Documents sufficient to show any criminal or disciplinary action or investigation, including the nature of the underlying alleged misconduct, of any teacher, administrator, or other employee of the School District that interacts directly with students and parents, including coaches, for any misconduct involving student(s), parent(s), other School District employee(s), or that occurred on School District property or at any school(s) therein during the Relevant Time Period.

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28	All Documents relating to any arrests or law enforcement investigations of Students, teachers, coaches or administrators during the Relevant Time Period.	Documents sufficient to show any arrests or law enforcement investigations, including the nature of the underlying alleged misconduct, of any Student, teacher, administrator, or other employee of the School District that interacts directly with students and parents, including coaches, for any misconduct involving Student(s), parent(s), other School District employee(s), or that occurred on School District property or at any schools therein during the Relevant Time Period.
31	Documents which address, mention, analyze, track, or otherwise reference teacher turnover (including voluntary and involuntary), teacher retention, and teacher mobility during the Relevant Time Period.	Documents which address, mention, analyze, track, or otherwise reference teacher turnover (including voluntary and involuntary), teacher retention, and teacher mobility ¹ during the Relevant Time Period.

¹ At Plaintiffs' request, Defendants defined "teacher mobility" as "teachers transitioning from one school to another within the School District due to job dissatisfaction or lack of available resources."